

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

EDWARD PINKESZ on behalf of himself and
all other similarly situated consumers

Plaintiff,

-against-

PORFOLIO RECOVERY ASSOCIATES LLC

Defendant.

Index No. CV-12-2508

**INITIAL CONFERENCE
QUESTIONAIRRE**

In accordance with Fed. R. Civ. P. 16(b), the Court hereby orders as follows:

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure: **December 14, 2012.**
2. Deadline for first request for production of documents and first request for interrogatories: **January 16, 2013.**
3. If additional interrogatories beyond the 25 (twenty-five) permitted under the Federal Rules are needed, the maximum number of:

Plaintiff: **N/A**; and

Defendant: **N/A**

4. Maximum number of requests for admission by:

Plaintiff: **N/A**; and

Defendant: **N/A**

5. Number of depositions by plaintiff of:

Parties: **5**; and

Non-parties: **5**

6. Number of depositions by defendant of:

Parties: **5**; and

Non-parties: **5**

7. Time limits for depositions: **N/A**.

8. Date of status conference: (joint status report due two business days in advance): **March 15, 2013.**

9. Date for completion of factual discovery: **March 29, 2013.**

10. Number of expert witnesses of plaintiff:

Medical: **N/A**; and

Non-medical: **0.**

11. Date for expert report: **N/A**.

12. Number of expert witnesses of defendant:

Medical: **N/A**; and

Non-medical: **0.**

13. Date for expert report: **N/A**.

14. Date for completion of expert discovery: **N/A**.

15. Have counsel reached any agreement for disclosure of experts' work papers (including drafts) and communications with experts? **N/A**.

16. Time for amendment of the pleadings by: **February 22, 2013.**

17. Number of proposed additional parties to be joined by:

i. Plaintiff: **5**;

ii. Defendant: **5**

18. Completion of joinder of additional parties: **February 22, 2013.**

19. Date of pretrial conference (brief *ex parte* statements of settlement position due via fax two business days in advance): **June 28, 2013.**

20. Types of contemplated dispositive motions:

i. Plaintiff: **summary judgment, class certification.**

ii. Defendant: **summary judgment.**

21. Dates for filing contemplated dispositive motions: **April 19, 2013.**

22. Does any party object to having this case included in the Court's Electronic Filing program: **No.**

23. Will the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(c)?

No.

The parties reserve the right to amend their responses to this initial questionnaire and subsequent Rule 26(f) report.

Dated: Brooklyn, New York
December 11, 2012

/s/ Maxim Maximov
Maxim Maximov, Esq.
Attorneys for the Plaintiff
Maxim Maximov, LLP
1600 Avenue M, 2nd Floor
Brooklyn, New York 11230
Office: (718) 395-3459
Facsimile: (718) 408-9570
Mobile: (718) 772-3954
E-mail: m@maximovlaw.com

/s/ Rachel Marin
Rachel Marin, Esq.
Attorneys for the Defendant – Portfolio
Recovery Associates, LLC
Maurice & Needleman, P.C.
5 Walter E. Foran Blvd., Suite 2007
Flemington, New Jersey 08822
Main (908) 237-4550
E-mail: rmarin@mnlawpc.com